

Appl. No. 10/032,796
Amdt. dated November 10, 2005
Reply to Office Action of August 23, 2005

PATENT

REMARKS/ARGUMENTS

Claims 1-16 are pending in this application. No claims are amended, canceled, or added. Therefore, claims 1-16 are present for examination, and claims 1, 11, and 16 are the independent claims. No new matter is added by these amendments.

Claims 1-15 are rejected under 35 U.S.C. §102(b) as being anticipated by the cited portions of Goldschlag et al., U.S. Pat. Num. 6,108,644 ("Goldschlag"). Claim 16 is rejected under 35 U.S.C. §102(b) as being anticipated by the cited portions of Chang et al., U.S. Pat. Num. 6,105,012 ("Chang"). Therefore, claims 1-16 are present for examination. The Applicants respectfully traverse the rejections, and request reconsideration of this application.

1. §102 Rejections - Goldschlag

For a valid anticipation rejection under §102(b), the Office must show that each and every limitation from the claims appears in a single piece of prior art. Applicants believe limitations from independent claims 1 and 11 are not present in Goldschlag. More specifically, Goldschlag cannot be relied on to teach or suggest (1) the *form identifier* recited by claims 1 and 11, or (2) *verifying* with whether the *identifier* is a *valid* identifier for the *form* being *used*, as recited by claims 1 and 11. For at least these reasons, Applicants respectfully request reconsideration of the rejection to the claims.

A. Form Identifier: The present claims provide for systems and methods for auditing *forms*, which may help ensure that updated or otherwise valid forms are being used. Such forms may, by way of example, be used for various business transactions or to gather information. Claims 1 and 11 call for receiving a *form identifier* that is *associated* with a *form*. The claims make it very clear that the form identifier *identifies* a *form*.

There is nothing equivalent in Goldschlag, as the identifier relates to a *customer and transaction*, not a form. The "identifier" of Goldschlag referenced by the Office relates to a customer identifier and audit secret (Office Action dated August 23, 2005 ("Office Action")), p.

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2, ll. 12-13; p. 4, ll. 13-14; p. 7, ll. 20-21). The Office Action stipulates that the identifier of Goldschlag identifies "the customer and the customer's transaction" (*Id.*, p. 7, ll. 11-13). Even assuming that the customer filled out a *form* during the registration process, the identifier of Goldschlag identifies the customer and the customer's transaction - not the form itself.

B. Valid Identifier for the Form being Used: Claims 1 and 11 call for verifying whether the form identifier is a valid identifier for the form being used. The form identifier in the present claims is compared to a database or other listing of identifiers to determine if the identifier is valid for the form being used.

But the audit secret in Goldschlag is used to ensure that the customer and transaction are legitimate; the example of an audit secret given in Goldschlag is a credit card number. The audit secret is associated with a particular customer. The audit protocol of Goldschlag sets forth a procedure to include certain verifying data (audit secret/customer identifier) in an electronic transaction to help protect against fraud (Goldschlag, col. 7, ll. 50-64). The vendor compares the "audit secret" information in a transaction request message and audit response message to determine if the *transaction request* is legitimate (Goldschlag, col. 8, ll. 16-18, 65-67; col. 9, ll. 1-2).

The audit secret in Goldschlag is, therefore, compared to a previously received audit secret are to determine *legitimacy of a transaction request*. The claimed embodiments may validate a *form* by comparing a form identifier to a database or other *listing of valid form identifiers* to determine if the *form is valid*. Goldschlag fails to teach or suggest the listing of valid form identifiers used to determine if a form is valid.

2. §102 Rejections - Chang

As noted above, under §102(b), the Office must show that each and every limitation from the claims appears in a single piece of prior art. Chang is directed at providing "secure communication between a financial server and a user associated with a web browser" (Chang, col. 1, ll. 57-58). The Applicants believe limitations from independent claim 16 are not

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present in Chang. More specifically, Chang does not teach or suggest (1) the *form identifier* recited by claim 16, (2) the *database* comprising a *record* of a *set of forms* and *form identifiers* recited by claim 16, or (3) *verifying*, in response to an audit request, whether the *identifier* is a *valid identifier* for the *form* being *used*, as called for by claim 16. For at least these reasons, Applicants respectfully request reconsideration of the rejection to claim 16.

A. Form Identifier: The claims provide for systems and methods for auditing *forms*. Claim 16 calls for receiving a *form identifier* that is *associated* with a *form*, and the claims make it very clear that the form identifier *identifies* a *form*.

There is nothing equivalent in Chang, as the identifier referred to by the Office concerns an identifier associated with a particular user, not a form. The "identifiers" of Chang cited by the Office relate to an account identifier for a particular user (Office Action, p. 5, ll. 13-14, *citing* Chang, col. 5, ll. 55-58), and other identifying customer information (Office Action, p. 5, ll. 13-14, *citing* Chang, col. 8, ll. 7-14; col. 10, ll. 28-35). The Office Action fails to address how these identifiers constitute the *form identifiers* recited by claim 16. Even assuming that the customer filled out a form during the registration process or otherwise uses an HTML form, the identifiers of Chang identify the user and the user's account - not the form itself.

B. Database of a Set of Forms and Valid Form Identifiers: Claim 16 calls for a database having a record of a set of forms and a valid form identifier. But in rejecting this element of the claim, the Office refers to a database in Chang storing (1) a user's public key (Chang, col. 3, ll. 1-2), (2) information associated with each user (*Id.*, col. 4, ll. 63-64), and (3) an account identifier and a password (*Id.*, col. 5, ll. 1-3). These database elements do not suggest the relevant claim limitations.

There is no teaching or suggestion in Chang that a *record of a set of forms* be stored in the database. Nor is there a teaching that a valid form identifier for each form of the set be stored in the database. The Office refers to parts of Chang directed at user information and

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account identifiers, whereas the claims recite a *record of a set of forms* and corresponding valid form identifiers.

C. Valid Identifier for the Form being Used: Claim 16 calls for verifying, in response to an audit request, whether the identifier is a valid identifier for the form being used. The form identifier in claim 16 is compared to a database of valid form identifiers to determine if the identifier is valid for the form being used.

The Office cites the "audit trail" containing an "account identifier" in Chang to read on this limitation (Office Action, p. 6, ll. 8-9, *citing* Chang, col. 5, ll. 55-60). But the audit of Chang is used to "verify client messages and requests" (Chang, col. 5, l. 52). It is simply a listing of "[e]ach communication initiated by a client and received by a financial server" (*Id.*, col. 5, ll. 52-54). This clearly fails to teach determining whether the identifier is a valid identifier for the form being used.

The Office goes on to cite certain financial server processing steps as reading on the same elements (Office Action, p. 6, ll. 8-9, *citing* Chang, col. 8, ll. 61-68). But the audit trail and financial server processing steps are separate processes. Moreover, this portion of Chang merely addresses how a user may access a server by means of an account identifier and a password. It is evident that the teaching in Chang of account identifiers and passwords for user access fails to suggest the verification of a form identifier by comparing it to a listing of valid form identifiers.

CONCLUSION

The Applicants respectfully assert that independent claims 1, 11 and 16 are now allowable for at least the foregoing reasons. Claims 2-10 and 12-15 each depend from the independent claims, and these claims are believed allowable for at least the same reasons.

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

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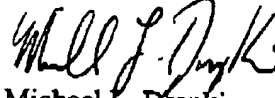
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If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 303-571-4000.

Respectfully submitted,



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